

**CENTER FOR DRUG EVALUATION AND  
RESEARCH**

*APPLICATION NUMBER:*

**21-341**

**CHEMISTRY REVIEW(S)**

**CHEMISTRY REVIEW**

**NDA 21-341**

**Bextra (Valdecoxib) Tablets**

**G.D. Searle & Co.**

**Rao Puttagunta, Ph.D.**

**Division of Anti-inflammatory, Analgesic and Ophthalmic  
Drugs (HFD-550)**

# Table of Contents

<b>Table of Contents.....</b>	<b>2</b>
<b>Chemistry Review Data Sheet.....</b>	<b>4</b>
<b>The Executive Summary.....</b>	<b>8</b>
I. Recommendations .....	8
A. Recommendation and Conclusion on Approvability .....	8
B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Applicable .....	8
II. Summary of Chemistry Assessments.....	8
A. Description of the Drug Product(s) and Drug Substance (s) .....	8
B. Description of How the Drug Product is Intended to be Used: .....	9
C. Basis for Approvability or Not-Approval Recommendation:.....	9
III. Administrative .....	10
A. Reviewer's Signature.....	10
B. Endorsement Block .....	10
C. CC Block.....	10
<b>Chemistry Assessment.....</b>	<b>11</b>
A. DRUG SUBSTANCE.....	11
1. DESCRIPTION.....	11
a. Physical and Chemical Characteristics .....	11
b. Elucidation of Structure .....	13
2. MANUFACTURER .....	15
3. SYNTHESIS AND METHOD OF MANUFACTURE.....	16
a. Flow Chart (Commercial Process).....	16
b. Description .....	17
c. Starting Materials .....	17
4. PROCESS CONTROLS.....	19
a. Synthesis Reagents and Solvents.....	19
b. Reaction Completion and Other In-Process Tests .....	19
c. Intermediate Specifications and Tests .....	19
5. LABORATORY CONTROLS FOR THE DRUG SUBSTANCE.....	20
a. Specification and Batch Analysis data .....	20
b. Analytical Methods .....	22
c. Purity Profile.....	31
d. Microbiology .....	33
6. CONTAINER.....	33
7. REFERENCE STANDARD .....	33

## **CHEMISTRY REVIEW**

<b>8. STABILITY .....</b>	<b>34</b>
<b>B. DRUG PRODUCT.....</b>	<b>37</b>
<b>1. COMPONENTS AND COMPOSITION.....</b>	<b>37</b>
<b>2. CONTROLS FOR INACTIVE INGREDIENTS.....</b>	<b>38</b>
<b>3. MANUFACTURER .....</b>	<b>39</b>
<b>4. MANUFACTURING AND PACKAGING.....</b>	<b>40</b>
a. <u>Production Operations</u> .....	40
b. <u>Reprocessing</u> .....	40
<b>5. LABORATORY CONTROLS FOR THE FINISHED DOSAGE FORM.....</b>	<b>41</b>
a. <u>In-Process Controls</u> .....	41
b. <u>Specifications and Methodology</u> .....	41
c. <u>Analytical Methods</u> .....	42
d. <u>Batch Analysis</u> .....	48
<b>6. CONTAINER/CLOSURE SYSTEM .....</b>	<b>48</b>
<b>7. MICROBIOLOGY .....</b>	<b>50</b>
<b>8. STABILITY .....</b>	<b>51</b>
<b>C. INVESTIGATIONAL FORMULATIONS.....</b>	<b>54</b>
<b>D. ENVIRONMENTAL ASSESSMENT.....</b>	<b>56</b>
<b>E. METHODS VALIDATION .....</b>	<b>56</b>
<b>F. LABELING.....</b>	<b>56</b>
<b>G. ESTABLISHMENT INSPECTIONS.....</b>	<b>57</b>
<b>H. LIST OF DEFICIENCIES.....</b>	<b>57</b>

**APPEARS THIS WAY  
ON ORIGINAL**

**CHEMISTRY REVIEW**

Chemistry Review Data Sheet

# Chemistry Review Data Sheet

**1. NDA #:** 21-341

**2. REVIEW #:** 1

**3. REVIEW DATE:** 14-NOV-2001

**4. REVIEWER:** Rao Puttagunta

**5. PREVIOUS DOCUMENTS:** N/A

**6. SUBMISSION(S) BEING REVIEWED:**

<u>Submission(s) Reviewed</u>	<u>Document Date</u>
Original	15-JAN-2001
Amendment 1	19-JUL-2001
Amendment 2	31-AUG-2001
Amendment 3	26-OCT-2001
Amendment 4	02-NOV-2001
Amendment 5	09-NOV-2001

**7. NAME & ADDRESS OF APPLICANT:**

Name: G.D. Searle & Co.  
Address: 4901 Searle Parkway, Skokie, IL 60077  
Representative: Peter East, Associate Director, Regulatory Affairs  
Telephone: 847-982-8606

**8. DRUG PRODUCT NAME/CODE/TYPE:**

- a) Proprietary Name: Bextra
- b) Non-Proprietary Name: Valdecoxib Tablets
- c) Code Name#: SC-65872
- d) Chem. Type/Submission Priority (ONDC only):
  - Chem. Type : 1
  - Submission Priority: S

## CHEMISTRY REVIEW

### Chemistry Review Data Sheet

**9. LEGAL BASIS FOR SUBMISSION:** N/A

**10. PHARMACOL. CATEGORY:** Relief of signs and symptoms of osteoarthritis and adult rheumatoid arthritis

**11. DOSAGE FORM:** Tablets

**12. STRENGTH/POTENCY:** 10 mg and 20 mg per Tablet

**13. ROUTE OF ADMINISTRATION:** Oral

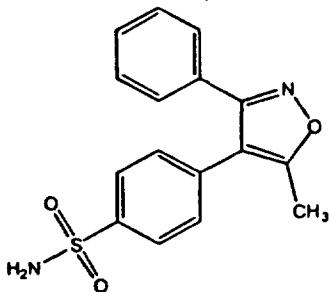
**14. Rx/OTC DISPENSED:**  Rx  OTC

**15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM)**

SPOTS product - Form Completed

Not a SPOTS product

**16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:**



**Chemical name:** 4-(5-methyl-3-phenyl-4-isoxazolyl)benzenesulfonamide

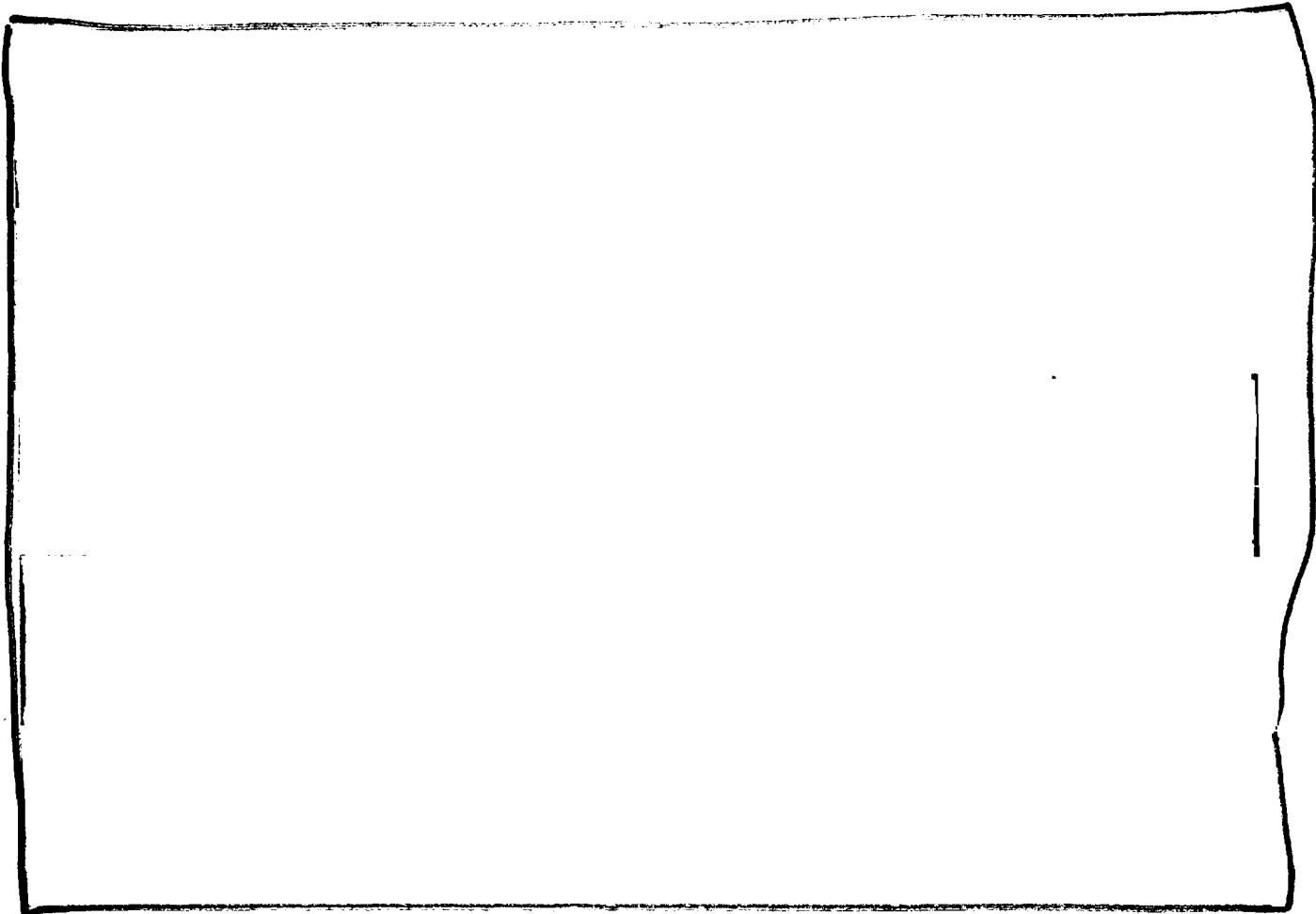
**Molecular Formula:** C<sub>16</sub>H<sub>14</sub>N<sub>2</sub>O<sub>3</sub>S **Molecular Weight:** 314.36

## **CHEMISTRY REVIEW**

### **Chemistry Review Data Sheet**

#### **17. RELATED/SUPPORTING DOCUMENTS:**

##### **A. DMFs:**



**Action codes for DMF Table:**

1 - DMF Reviewed.

Other codes indicate why the DMF was not reviewed, as follows:

2 - Type 1 DMF

3 - Reviewed previously and no revision since last review

4 - Sufficient information in application

5 - Authority to reference not granted

6 - DMF not available

7 - Other (explain under "Comments")

# CHEMISTRY REVIEW

## Chemistry Review Data Sheet

### B. Other Documents:

DOCUMENT	APPLICATION NUMBER	DESCRIPTION
IND	[REDACTED]	Valdecoxib
IND	[REDACTED]	Valdecoxib

### 18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Biometrics	N/A		
EES	Acceptable	24-SEP-2001	J.D. Ambrogio
Pharm/Tox	N/A		
Biopharm	N/A		
LNC	USAN	1998	
Methods Validation	Pending	Initiated on 02-NOV-2001	
OPDRA	Acceptable	10-OCT-2001	Marci Lee
EA	FONSI recommended	24-OCT-2001	Melissa J. Maust
Microbiology	N/A		

APPEARS THIS WAY  
ON ORIGINAL

## CHEMISTRY REVIEW

### Executive Summary Section

# The Chemistry Review for NDA 21-341

### The Executive Summary

#### I. Recommendations

##### A. Recommendation and Conclusion on Approvability

From the chemistry standpoint this NDA is recommended for approval.

##### B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable

N/A

#### II. Summary of Chemistry Assessments

##### A. Description of the Drug Product(s) and Drug Substance (s)

Valdecoxib (SC-65872), an isoxazole derivative, is a selective inhibitor of cyclooxygenase-2 (COX-2). The drug substance (valdecoxib) is a white to off white solid. Valdecoxib has very low solubility in water (10 mcg/mL at 25°C, pH 7.0). It is more soluble in organic solvents such as methanol (51-77 mg/mL), acetone (136-181 mg/mL), dimethyl sulfoxide (>283 mg/mL) and tetrahydrofuran (229-413 mg/mL) at ambient temperature.

Details of the drug substance manufacturing process are included. The drug substance specification was considered adequate after the acceptance criteria for

## CHEMISTRY REVIEW

### Executive Summary Section

A description of the drug product manufacturing process is included.

were established to achieve consistency in product quality.

The drug product specification was considered adequate after the applicant included the test for \_\_\_\_\_ in response to a request for justification for omission of the test.

The tablets are packaged in \_\_\_\_\_. The packaging materials used were found adequate. The submitted drug product stability data include long-term stability data for \_\_\_\_\_.

\_\_\_\_\_. The applicant initially proposed a \_\_\_\_\_ expiration date. Based on the submitted data it was decided to allow a 36-month expiration period for the bottles and a 30-month expiration period for the blister package. The applicant agreed to these expiration dates.

The proposed dissolution acceptance criterion ( $Q \geq$  \_\_\_\_\_ at 45 minutes) is acceptable to the Biopharm reviewer Dr. Veneeta Tandon (discussed on 10/18/01).

The original application proposed a total of \_\_\_\_\_ 10, 20 \_\_\_\_\_ mg. Firm did not seek approval for \_\_\_\_\_. At the time of this review the medical reviewers indicated that only the 10 mg and 20 mg tablet strengths will be approved.

#### B. Description of How the Drug Product is Intended to be Used:

Bextra (valdecoxib) tablets are intended to be used orally for the relief of osteoarthritis and adult rheumatoid arthritis. The recommended maximum dose is 20 mg/day. Bextra tablets will be supplied in \_\_\_\_\_ bottles in 100 and 500 counts, and in a carton of 100 unit doses.

The expiration period for the drug product in \_\_\_\_\_ bottle is 36 months, and for the drug product in the unit dose package is 30 months.

Recommended storage conditions: 25°C (77°F); excursions permitted to 15-30°C (59-86°F).

#### C. Basis for Approvability or Not-Approval Recommendation:

N/A

## **CHEMISTRY REVIEW**

### **Executive Summary Section**

### **III. Administrative**

#### **A. Reviewer's Signature**

#### **B. Endorsement Block**

Chemist Name/Date: Rao Puttagunta/19-OCT-2001

Chemistry Team Leader Name/Date: John Smith/

Project Manager Name/Date: Carmen DeBellas/

#### **C. CC Block**

Orig. NDA # 21-341

HFD-550/Division File

HFD-550/Chem./R.Puttagunta

HFD-550/T.L./J.Smith

HFD-550/CSO/C.DeBellas

HFD-830/Dir./C.Chen

50 page(s) have been removed because it contains trade secret and/or confidential information that is not disclosable.

11-60